

Robert N. Werlin, Esq.
Keegan, Werlin & Pabian, LLP
265 Franklin Street, Sixth Floor
Boston, MA 02110-3113

BY FAX AND U.S. MAIL

RE: Boston Edison Company, D.T.E. 03-117-A (Phase II)

August 25, 2004

Dear Mr. Werlin:

Enclosed please find the Department's third set of information requests on the above-captioned matter. Responses should be filed on or before August 30, 2004. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.
Hearing Officer

cc: Mary Cottrell
Staff as assigned
Judith Laster, Assistant Attorney General

Encl.

THIRD SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
BOSTON EDISON COMPANY, D.T.E. 03-117-A

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "BECo" or "Company" means Boston Edison Company, its officers, directors, employees, consultants, and attorneys.
2. "Initial Filing," means all the documents BECo filed in this proceeding on December 1, 2003. For this information request, please refer specifically to exh. BEC-JFL-2, at 2.
3. "Supplemental Filing" means all the supplemental testimony and exhibits to the Initial Filing that BECo filed in this proceeding on March 1, 2004. For this information request please refer specifically to exh. BEC-JFL-2 (Supp.) at 2.
4. "Settlement" means the Settlement Agreement between BECo and the Attorney General filed with the Department on August 10, 2004. For this information request, please refer specifically to exh. BEC-JFL 2 (Settlement) at 2.
5. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
6. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
7. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
8. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how

the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.

9. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
10. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
11. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) Mark Barrett, Rates and Revenue Requirements Division; (3) Claude Francisco, Rates and Revenue Requirements Division; and (4) Sean Hanley, Rates and Revenue Requirements Division.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**THIRD SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY
BOSTON EDISON COMPANY, D.T.E. 03-117-A**

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company ("BECo") the following information request.

For this information request, please refer to the Settlement at 2-3, ¶ 2.1 and 2.2; exh. BEC-JFL-2 (Settlement) at 2; exh. BEC-JFL-2 (Supp.) at 2; and exh. BEC-JFL-2, at 2.

DTE-3-1 The Settlement states that the Settling Parties "reduced" by \$4.68 million BECo's payments in lieu of property taxes, to reflect the actual payment in lieu of property tax amount per agreement with the Town of Plymouth for calendar year 2003 (Settlement at 2-3 § 2.2(a)). The Settlement states that BECo's actual net payment for 2003 was \$10.136 million (exh. BEC-JFL-2 (Settlement) at 2). This amount is consistent with the Initial Filing (exh. BEC-JFL-2, at 2). BECo's Supplemental Filing, however, states that the actual net payment in lieu of property taxes for 2003 was \$14.816 million, or \$4.68 million higher than the Settlement figure (exh. BEC-JFL-2 (Supp.) at 2).

Please (a) explain why the Supplemental Filing states that BECo's actual net payment in lieu of property taxes to the Town of Plymouth for 2003 was \$4.3 million higher than the figure used in both the Settlement and the Initial Filing, and (b) provide complete and detailed documentation to support the information provided in exh. BEC-JFL-2 (Settlement).